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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

ROGER PAUL LANKFORD, :
Plaintiff :
-vs- : CASE NO. 1:14-CV-682
RELADYNE, LLC, ET AL, :
Defendants :

Deposition of CHARLES ANTHONY DOWNS, a
witness herein, taken by the Defendants as upon cross
examination and pursuant to the Federal Rules of
Civil Procedure as to the time and place and
stipulations hereinafter set forth, at the offices of
Britton & Associates, 201 Riverside Drive, Suite 2-B,
Dayton, Ohio at 11:44 a.m. on June 30th, 2015, before
Lainey Fergusson, a CSR, and Notary Public within and
for the State of Ohio.

* * * * *

QUICK REFERENCE INDEX

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INFORMATION REQUESTED

NOT APPLICABLE

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* * * * *

1 WHEREUPON:

2 CHARLES ANTHONY DOWNS,
3 of lawful age, a witness herein, being first duly
4 sworn as hereinafter certified, testified as
5 follows:

6 CROSS-EXAMINATION

7 BY MR. MANSELL:

8 Q. All right. Mr. Downs, will you please
9 state your name for the record?

10 A. Charles Anthony Downs.

11 Q. And do you go by Tony?

12 A. Correct.

13 Q. And, Mr. Downs, I'm an attorney that
14 represents Paul Lankford in this matter, and you've
15 already been deposed one time, but just as a
16 reminder, she's taking everything down and we need
17 to help her out by not talking over each other and
18 giving verbal answers. Is that fair?

19 A. That's fair.

20 Q. The same rule applies that if you need
21 a break, let me know and we'll be happy to get you
22 one as long as you answer any question that is
23 pending. Is that fair?

24 A. That's fair.

25 Q. Any reason that you would not be able

1 to recall facts truthfully or accurately today?

2 A. No.

3 Q. All right. Mr. Downs, tell me when you
4 first became aware of, how you first became aware
5 that Mr. Lankford was going to be taking a leave of
6 absence?

7 A. He called me one afternoon and said he
8 had to check himself into rehab in Florida and he
9 would be gone, approximately, 35 days, and I told
10 him to take all the time he needed. We were here
11 to support him, and it was a short conversation.

12 Q. Did you talk about paperwork or
13 anything of that nature?

14 A. I did not.

15 Q. Did you inform anybody in human
16 resources about Mr. Lankford's need to take a leave
17 of absence for rehab?

18 A. The best I can recall was we have two
19 people in my office who handled HR at that time and
20 I informed them.

21 Q. And who was that?

22 A. Chris Chaille and Ann Boeckermann.

23 Q. And you informed both of them?

24 A. Correct.

25 Q. And did they tell you to do anything

1 else at that point?

2 A. No.

3 Q. Were you, did you play any part in the
4 paperwork that Mr. Lankford was to fill out or --

5 A. No.

6 Q. And did you have any more conversations
7 with Mr. Lankford prior to him going to inpatient
8 care?

9 A. What do you mean prior conversation?
10 About him going into rehab?

11 Q. Yes. Before he actually went into
12 rehab.

13 A. No, that was the first.

14 Q. You just had that one conversation and
15 then he went, as far as you know, he went off to
16 rehab?

17 A. Correct.

18 Q. All right. Did you have any role or
19 responsibility informing his customers that he was
20 going to be taking a leave of absence?

21 A. No. We did not inform any customers,
22 to the best of my knowledge.

23 Q. Was anybody going to be covering his
24 accounts?

25 A. We had some inside salespeople. Every

1 outside guy has an inside person, and they were
2 going to handle it.

3 Q. So if a customer wants to get ahold of
4 an outside guy and he's sitting down meeting with
5 another customer, will the call get forwarded to
6 the inside sales --

7 A. No, not forwarded. But most of the
8 customers knew who their inside contact was.

9 Q. So if they couldn't get ahold of the
10 outside guy and they need something quickly, they
11 could go to the inside guy?

12 A. Correct.

13 Q. Did you have any conversations with
14 Walt Rodgers about Mr. Lankford's need to take a
15 leave of absence prior to Mr. Lankford actually
16 going into rehab?

17 A. No.

18 (WHEREUPON, Plaintiff's Exhibit 7
19 was marked for identification.)

20 BY MR. MANSELL:

21 Q. All right. I'm handing you what's been
22 marked as Plaintiff's Exhibit 7. Have you seen
23 this e-mail thread before?

24 A. No.

25 Q. All right. Is the bottom e-mail, and

1 e-mails go in reverse chronological order how they
2 print out. The bottom of the e-mail here is from
3 Bob Johnson to yourself and Dan Oehler dated
4 February 3rd, 2014.

5 Do you see that?

6 A. Uh-huh.

7 Q. Yes?

8 A. Yes.

9 Q. And do you have any reason to doubt
10 that you didn't get that e-mail?

11 A. No. I get 200-and-some a day so
12 there's no way I'm going to remember e-mails.

13 Q. Sure. And so, the top e-mail is a
14 response from you back to Bob Johnson and Dan
15 Oehler shortly after the first e-mail; is that
16 accurate?

17 A. Uh-huh, yes.

18 Q. And who is Bob Johnson?

19 A. He is a national sales manager.

20 Q. And at the time in February 2014 is
21 that the position he held?

22 A. Yes. And at one time, I do not know
23 the dates, he was, he acted as our sales manager
24 when we did not have one for Cincinnati. He's over
25 the entire Reladyne corporation.

1 Q. And you're telling Bob Johnson and Dan
2 Oehler that Mr. Lankford has told some he is out on
3 medical leave?

4 A. That's what it states, correct.

5 Q. Do you remember having a conversation
6 with Dan Oehler on February 3rd about medical leave
7 related to Paul?

8 A. No.

9 (WHEREUPON, Plaintiff's Exhibit 8
10 was marked for identification.)

11 BY MR. MANSELL:

12 Q. I'm handing you what's been marked as
13 Plaintiff's Exhibit 8. What did we call the first
14 one?

15 A. Seven.

16 Q. All right. Have you had a chance to
17 review this document?

18 A. Almost.

19 Q. Okay. Let me know when you're ready.

20 A. (Witness reviews document.) Okay.

21 Q. All right. The bottom, the first
22 e-mail, which is on the bottom of the page on
23 Plaintiff's Exhibit 7, and then the top e-mail is
24 another response from you but now a little over a
25 day later on February 4th, 2014.

1 Do you see that?

2 A. Yes.

3 Q. All right. And you say, FYI, Paul L.
4 checked himself into rehab last Thursday in Florida
5 for 35 days due to drinking. Do you know what
6 prompted you to send this e-mail a day later?

7 A. What prompted me?

8 Q. Yes. You originally responded that
9 Paul has been telling some people he's out on
10 medical leave, and then a day later you go into
11 some detail for Dan and you actually take off
12 Mr. Johnson and add Doug Oehler on it. I just want
13 to know if you recall any specific reason as to
14 why --

15 A. Just informing them.

16 Q. Okay. And why are you informing them?
17 Who are Dan and Doug Oehler?

18 A. Doug is my direct boss. He's regional
19 VP, and Dan is VP of sales.

20 Q. Was Doug your direct boss at the time?

21 A. Yes.

22 Q. And was Dan Oehler also in your chain
23 of command?

24 A. My chain of command, he's a VP so he is
25 in the chain of command when it comes to sales.

1 (WHEREUPON, Plaintiff's Exhibit 9
2 was marked for identification.)

3 BY MR. MANSELL:

4 Q. All right. I'm handing you what's been
5 marked as Plaintiff's Exhibit 9. Tell me when
6 you're ready.

7 A. Okay.

8 Q. And you would agree that Plaintiff's
9 Exhibit 9 has the same two e-mails at the bottom as
10 Exhibit 8, but now has a response from Dan Oehler
11 at the top, approximately, five minutes after you
12 sent your e-mail?

13 A. Correct.

14 Q. And he copies Walt Rodgers on it, as
15 well. Do you see that?

16 A. Correct.

17 Q. Who is Walt Rodgers at this time?

18 A. VP of HR.

19 Q. All right. And Dan Oehler says, Tony,
20 you did not tell me. I found out yesterday from
21 Bob Johnson. I'm in Houston, and we will need to
22 discuss this. We have too many signs to ignore and
23 not proactively address.

24 Do you recall having a discussion
25 with Mr. Oehler shortly after this e-mail?

1 A. No.

2 Q. Okay. Is it possible that you had a
3 conversation and you just don't remember?

4 MR. WINTERS: Objection. I've
5 asked him not to speculate on possibilities. He
6 can tell you what he remembers.

7 MR. MANSELL: Okay.

8 BY MR. MANSELL:

9 Q. You can answer that question. Are you
10 telling me you do not remember or are you saying
11 that conversation did not occur?

12 A. I do not remember.

13 Q. What was your understanding of
14 Mr. Oehler's last sentence, we have too many signs
15 to ignore and not proactively address? What was
16 your understanding of what that meant?

17 A. It did not mean anything to me. I just
18 read it and went on.

19 Q. I'm handing you what's been previously
20 marked as Plaintiff's Exhibit 3. It's the same
21 e-mail chain we've been discussing, but now you
22 have forwarded the e-mail chain to David Luke and
23 Tim Mastropaolo about six minutes later.

24 Do you see that?

25 A. Yes.

1 Q. And do you recall why you would forward
2 this e-mail chain to David Luke?

3 A. Yes. Because he was in charge of the
4 investigation with Paul.

5 Q. What investigation with Paul?

6 A. When we first found out there was a
7 problem with missing product.

8 Q. And why would you send this to Tim
9 Mastropaolo?

10 A. He is my operations manager who also
11 gets a lot of calls from customers. He's part of
12 the management team so I forwarded it to him to let
13 him know what was going on.

14 Q. What in this e-mail chain did you feel
15 was necessary information for David Luke to have?

16 A. All of it.

17 Q. Okay. So the fact that Paul checked
18 himself into rehab last Thursday in Florida for 35
19 days due to drinking was information you wanted
20 David Luke to have?

21 A. If it was in the e-mail, I wanted him
22 to have it.

23 Q. Can you explain to me how that's
24 relevant to any investigation?

25 A. You would have to ask him.

1 Q. Oh, did he ask you to give him any
2 information about Paul Lankford?

3 A. No. He was conducting an investigation
4 so I thought it was best he knew of any e-mails or
5 any information.

6 Q. What do you recall, or how do you
7 recall first being notified that there was an issue
8 regarding Paul Lankford that warranted an
9 investigation?

10 A. To the best of my knowledge, David Luke
11 and Tim Mastropaolo approached me that there was
12 some issues. Didn't go into it at great detail,
13 but it was given the okay for David Luke to pursue
14 the investigation by, I don't know. I didn't
15 approve it per se, but between me, Tim, and David,
16 we said we had to pursue the investigation.

17 (WHEREUPON, Plaintiff's Exhibit 10
18 was marked for identification.)

19 BY MR. MANSELL:

20 Q. Okay. I'm handing you what's been
21 marked as Plaintiff's Exhibit 10. All right. Have
22 you seen this or do you agree that this is an
23 e-mail chain that you are either copied on or
24 sending?

25 A. Correct.

1 Q. And the second page is titled,
2 investigation into misappropriation of product?

3 A. Correct.

4 Q. I want to turn to that second page.

5 A. Uh-huh.

6 Q. I want you to drop down to about the
7 middle of the page where the paragraph, it says,
8 upon. Do you see that?

9 A. Yes.

10 Q. Do you recall Bruce Gee making a
11 complaint, or did Bruce Gee make a complaint to
12 you?

13 A. He never approached me. It was
14 between, I don't know if he approached David Luke
15 or Tim or both. I have no idea who he approached
16 first.

17 Q. When did you first become aware that
18 Bruce Gee had approached anyone?

19 A. When Tim and David Luke told me the
20 first about it.

21 Q. The second, the next paragraph down, it
22 states that Tim contacted David Luke to look into
23 the matter on January 14th, 2014. Do you believe
24 that's when you found out is, approximately,
25 mid-January?

1 A. To the best of my knowledge, yes.

2 Q. Did you have any input at that time?

3 A. No.

4 Q. Now, were you aware of a promotion that
5 Mr. Lankford had with the Covington Auto Body?

6 A. What I was aware of, Paul came to me
7 and wanted to do a donation, and that's all I
8 recall of that and the auto body.

9 Q. Did you approve it?

10 A. Correct.

11 Q. Do you recall when that, approximately,
12 was?

13 A. No, I do not.

14 Q. All right. And so, I wanted you to go
15 back to the first page now. It's an e-mail, the
16 bottom e-mail is from David Luke to yourself and
17 Tim Mastropaolo dated January 7, 2014, and it
18 states, here is a written report on the allegations
19 against Paul Lankford.

20 Do you see that?

21 A. Yes.

22 Q. Is this the first time the report was
23 sent to you January 27, 2014?

24 A. To the best of my knowledge, yes.

25 Q. Okay. And what did you do with the

1 report when you got it?

2 A. I read it and then I forwarded it to
3 Ann, who was also helping in HR and payroll, and
4 she's also our controller. Tim was responsible at
5 that time for doing outside sales commission and
6 was in charge of doing the entire payroll for our
7 staff. And she does accounting and then she had,
8 she was responsible, she had the personnel files,
9 as well, access to the personnel files along with
10 Chris.

11 Q. So you don't send it right away, you
12 receive it on a Monday and you don't send it to Ann
13 Boeckermann until Tuesday of the following week.
14 Do you see that?

15 A. Yes.

16 Q. Why did you wait so long? Any reason
17 you can recall?

18 A. I could have been out of town. I could
19 have been with, I have no idea where I was or why I
20 waited.

21 Q. All right. And why would Ann
22 Boeckermann, why would she need this document?

23 A. She's part of the management team and
24 HR so I felt she needed to be in the loop.

25 Q. All right. Did you forward this

1 particular document to anybody else?

2 A. To the best of my knowledge, no.

3 Q. After you received this e-mail with the
4 report, the one-page report from David Luke on
5 January 27th, did you have any conversations
6 between January 27th and February 4th with Mr. Luke
7 or Mr. Mastropaolo related to the report?

8 A. I do not remember.

9 Q. Was it your understanding that Mrs.
10 Boeckermann would, well, what was your
11 understanding what Ms. Boeckermann would do with
12 the report?

13 A. I had no plans of doing anything other
14 than just to inform her of what was going on.

15 Q. Do you believe that you were aware of
16 the allegations against Mr. Lankford prior to him
17 going on leave?

18 A. No. I did not know anything about the
19 allegations.

20 Q. If you look on the second page of
21 Exhibit 10, that third paragraph up from the
22 bottom, it starts with, upon hearing this
23 allegation --

24 A. Uh-huh.

25 Q. -- the last sentence says, once Tim had

1 this information, he contacted me to look into this
2 matter on January 14th, 2014. Do you see that?

3 A. Yes.

4 Q. And Mr. Lankford didn't call you until
5 the end of January to go on medical leave, correct?

6 A. Correct.

7 Q. So you believe that you weren't
8 informed of the allegations prior to looking at
9 that January 14th date and knowing that Mr.
10 Lankford didn't go on leave until the end of the
11 month? Do you believe you didn't know of the
12 allegations prior to Mr. Lankford going on leave?

13 A. With the dates, I cannot recall.

14 Q. But you didn't have a conversation with
15 Mr. Lankford about the allegations prior to him
16 going on leave, did you?

17 A. No.

18 Q. Do you think it was appropriate to have
19 a conversation with Mr. Lankford to determine what
20 his side of the story was?

21 MR. WINTERS: Are you asking him
22 if he should have had a conversation with him?

23 MR. MANSELL: Yeah.

24 MR. WINTERS: Well, no, because I
25 think he's told you he wasn't sure when he learned

1 about it, and then he also told you he didn't --

2 MR. MANSELL: Gary, no more
3 speaking objections. You're speaking on the
4 record. If you have an objection --

5 MR. WINTERS: I am making my
6 objection.

7 MR. MANSELL: Then say objection.
8 If you keep speaking, we're going to stop the
9 deposition.

10 MR. WINTERS: Whatever you want,
11 but I have made my objection. He may answer your
12 question. I haven't --

13 MR. MANSELL: Will you repeat the
14 question?

15 (WHEREUPON, the reporter read back
16 the requested portion of testimony.)

17 THE WITNESS: To the best of my
18 knowledge with not having the dates when he called,
19 it did not even enter my mind. So, like I said, I
20 don't know exactly when him and David Luke informed
21 me so I cannot answer that question.

22 BY MR. MANSELL:

23 Q. Were you part of the investigation?

24 A. No.

25 Q. Were you part of the decision process

1 of terminating Mr. Lankford?

2 A. No. I did not fight it when I got the
3 word from Walt saying per the ethical violation on
4 the handbook. Then I took it from there.

5 Q. So whether or not the decision was made
6 before or after you talked with Mr. Lankford, that
7 wasn't a concern of yours? You weren't a part of
8 the investigation?

9 A. I was not part, correct, but I do
10 remember when I informed Mr. Luke that he was going
11 into rehab, he said he was conducting an
12 investigation and we couldn't do anything until he
13 came back.

14 Q. I want you to look back on Exhibit 9,
15 the e-mail you sent to Dan and Doug Oehler
16 informing them of Mr. Lankford's rehab and leave of
17 absence, among other things, is dated February 4th,
18 2014 at 8:57 a.m.

19 Do you see that?

20 A. Correct.

21 Q. All right. And then Mr. Oehler
22 responds shortly after that and then after having,
23 and then I want to jump back to Exhibit 10. Now,
24 after having the report for over a week, you now,
25 for the first time, forward the report to Ann

1 Boeckermann, who was acting as human resources.

2 Is there any reason that you
3 waited a week-and-a-day, but only less than an
4 hour-and-a-half after you had some e-mails back and
5 forth about Mr. Lankford's rehab, is there any
6 connection there?

7 MR. WINTERS: Objection, I think
8 it's confusing. You may answer if you understand.

9 THE WITNESS: Well, let's see, I
10 have five locations, over 100 associates, I'm in
11 and out of the office. So I have no idea. I can
12 be behind my desk sometimes and can reply,
13 sometimes I have to wait a day. It could be two
14 days so I do not recall, but there is a, are you
15 asking was there a connection?

16 BY MR. MANSELL:

17 Q. Did somebody tell you to forward this
18 report to Ann Boeckermann?

19 A. No.

20 Q. Did you have a conversation with Dan
21 Oehler or Doug Oehler about the report that's
22 attached to Exhibit 10?

23 A. To the best of my knowledge, I never
24 talked to Dan or Doug about the investigation.

25 Q. I'm handing you what's been previously

1 marked as Plaintiff's Exhibit 5. It's three pages.
2 There's an e-mail chain on the first page, and then
3 two pages of an attachment.

4 A. Okay.

5 Q. All right. I want you to first look at
6 the second and third pages of Exhibit 5. The
7 second page appears to be the initial report you
8 received back in January, correct?

9 A. Correct.

10 Q. And then the second page is additional
11 notes on the report after a February 4, 2014 visit
12 by David Luke to Covington Auto Body. Do you see
13 that?

14 A. Yes.

15 Q. Were you aware that Mr. Luke was going
16 to Covington Auto Body on February 4th?

17 A. He did not tell me to the best of my
18 knowledge beforehand, but I was informed, I
19 believe, after the fact, but I do not remember if
20 it was before or after.

21 Q. All right. And if you look at the
22 bottom of Page 1, there's an e-mail from David Luke
23 to yourself and Tim Mastropaolo dated February 5th,
24 2014 at 11:11 a.m.

25 Do you see that?

1 A. Yes.

2 Q. And you forwarded that e-mail and the
3 two-page report to Dan Oehler and Doug Oehler on
4 February 5th, 2014 at 11:17 a.m., approximately,
5 six minutes later. Do you see that?

6 A. Correct.

7 Q. All right. Why did you forward this
8 report to Dan Oehler?

9 A. To inform them of where we were on the
10 investigation.

11 Q. But prior to this, you hadn't talked
12 with him at all about the investigation?

13 A. To the best of my knowledge, no.

14 Q. And you hadn't forwarded him any
15 e-mails --

16 A. To the best of my knowledge, yes.

17 Q. Is there a reason why you're sending it
18 to Dan Oehler and copying it to Doug since Doug is
19 your direct supervisor? I just didn't know if
20 there was any reason why Dan is the recipient and
21 Dan is copied?

22 A. No idea why I did that, no. As long as
23 they both got it, I was not concerned with --

24 Q. All right. Now, the top e-mail is an
25 e-mail from Dan Oehler to Walt Rodgers and you're

1 copied on it. Do you see that?

2 A. Correct.

3 Q. Dated February 5th, 2014 at 10:57 p.m.?

4 A. Yes.

5 Q. It says, Walt, Tony may have sent this
6 to you also, but I want to make sure that you have,
7 as well. I discussed with Tony today my thoughts,
8 but we need to consult with you regarding his rehab
9 condition.

10 Do you see that?

11 A. Correct.

12 Q. Okay. And the first part of the second
13 sentence, I discussed with Tony today my thoughts,
14 do you recall having a conversation with Dan Oehler
15 on February 5th, 2014?

16 A. No, I do not.

17 Q. Do you remember any thoughts on this
18 subject that Mr. Oehler shared with you?

19 A. No, I do not.

20 Q. Okay. And the second part of sentence,
21 we need to consult with you regarding his rehab
22 condition, do you remember consulting with Walt
23 Rodgers regarding Mr. Lankford's rehab condition?

24 A. No.

25 Q. Did Dan Oehler give the go-ahead to

1 fire Mr. Lankford?

2 A. To the best of my knowledge, I received
3 the authority from Walt Rodgers, nothing from Dan
4 Oehler.

5 Q. Would Dan Oehler, in your experience,
6 have the authority to terminate one of your sales
7 reps?

8 A. With him being the vice-president, I
9 would believe, whatever he told me to do, I would
10 do.

11 (WHEREUPON, Plaintiff's Exhibit 11
12 was marked for identification.)

13 BY MR. MANSELL:

14 Q. I'm going to hand you what's been
15 marked as Plaintiff's Exhibit 11. Let me know when
16 you've had a chance to review that.

17 A. Okay.

18 Q. Okay. And so, the bottom two e-mails
19 on the page is what we've seen previously that
20 David Luke forwarded you and then you forwarded it
21 on to Dan and Doug Oehler, correct?

22 A. And Doug Oehler in this e-mail chain
23 responds to you, and Dan Oehler and says, the last
24 two reports from Paul are terrible and really
25 questions many things going on. I would like to

1 make a change in this territory. Reps need to be
2 reliable and trusted. He has proven different in
3 many cases.

4 Did I read that correctly?

5 MR. WINTERS: You did not. It
6 says, I would like to make a change, and he
7 wrote I would plan.

8 BY MR. MANSELL:

9 Q. Let's strike that then. I would plan
10 to make a change, starting on the second sentence,
11 I would plan to make a change in this territory.
12 Reps need to be reliable and trusted. He has
13 proven different in many cases.

14 Did I read that correctly?

15 A. Yes.

16 Q. And it was your understanding that the
17 last two reports Mr. Oehler is referring to are the
18 reports from, on Mr. Lankford going out on medical
19 leave that you explained in your e-mail on February
20 4th and the two-page report attached to the e-mail
21 you forwarded earlier that day?

22 A. Yeah. You would have to ask Doug that.
23 I have no idea what two reports he's talking about.

24 Q. You didn't have an understanding on
25 your own?

1 A. All I know is the investigation was an
2 ethics violation so I would assume, well, I'm not
3 going to assume, but you would have to ask Doug.

4 Q. Was the report, did the report have
5 anything to do with Mr. Lankford's reliability, the
6 report attached to this document, the two-page
7 report from David Luke?

8 A. I don't recall.

9 Q. Well, it had to do with
10 misappropriation of product, correct?

11 A. Yeah.

12 Q. And so, you could review the report, if
13 you would like, but I would just like to know if
14 you think there's anything in that report that
15 deals with reliability?

16 A. Oh, yes. If you can't trust, if
17 someone's misappropriating funds, to me, that's,
18 you can't rely on them.

19 Q. Okay. And did you respond to Doug
20 Oehler's e-mail and state, I agree we need to be
21 careful how we handle due to his rehab and
22 lawsuits, but I think we have enough to dismiss.

23 Did I read that correctly?

24 A. Correct.

25 Q. What did you mean by we need to be

1 careful how we handle due to his rehab and
2 lawsuits?

3 A. Because when I informed David Luke of
4 him going into rehab, that's when he said to hold
5 off. We cannot do anything until he gets back and
6 the investigation is done.

7 Q. Okay. And what is lawsuits, rehab and
8 lawsuits?

9 A. When I, as I stated, when I approached
10 David Luke, he said we can't do anything due to
11 lawsuits until he gets back.

12 Q. And then you finished the sentence, but
13 I think we have enough to dismiss. What did you
14 mean by that?

15 A. When someone steals, that's enough to
16 dismiss.

17 Q. So based on the contents of the report,
18 you thought, you think we have enough to dismiss?

19 A. Yes. I thought we had enough to
20 dismiss due to the investigation.

21 Q. But you hadn't talked with Mr. Lankford
22 at that point yet, correct?

23 A. No.

24 Q. So was a final decision made at that
25 time? Do you know?

1 A. To the best of my knowledge, the final
2 decision was made when I received the e-mail from
3 Walt Rodgers.

4 Q. At the bottom of the page on Exhibit
5 11, your e-mail after you got the David Luke report
6 says, David Luke to send more information. Do you
7 see that?

8 A. Yes.

9 Q. Okay. Do you remember what information
10 Mr. Luke was going to send?

11 A. To the best of my knowledge, further
12 information on the investigation.

13 Q. Had you seen any documentation as of
14 February 5th, 2014, any additional information at
15 that point?

16 A. All the documentation I received was
17 through e-mail.

18 (WHEREUPON, Plaintiff's Exhibit 12
19 was marked for identification.)

20 BY MR. MANSELL:

21 Q. I'm going to hand you what's been
22 marked as Plaintiff's Exhibit 12. Let me know when
23 you have had a chance to review Plaintiff's Exhibit
24 12.

25 A. Okay.

1 Q. All right. The first page is an e-mail
2 from David Luke to Rodgers, Doug and Dan Oehler,
3 correct?

4 A. Correct.

5 Q. And the attachments are, well, have you
6 seen these attachments before?

7 A. This e-mail I have not seen, but he did
8 show me at one time, and I don't remember when or
9 how, I've seen this before.

10 Q. Who's shown you it?

11 A. David Luke did.

12 Q. And you're referring to the second
13 page?

14 A. Yes.

15 Q. Okay. And what about the third page?

16 A. I do not remember seeing those.

17 Q. What about the fourth page?

18 A. At one time, I do remember seeing that,
19 yes.

20 MR. MANSELL: Let's take a quick
21 break. I want to make a copy of an exhibit.

22 (WHEREUPON, a recess was taken.)

23 (WHEREUPON, Plaintiff's Exhibit 13
24 was marked for identification.)

25 BY MR. MANSELL:

1 Q. Mr. Downs, we are back on the record,
2 and I've handed you what's been marked as
3 Plaintiff's Exhibit 13. Let me know when you've
4 had a chance to review that.

5 A. (Witness reviews document.) Okay.

6 Q. You talked about receiving an e-mail
7 from Walt Rodgers citing a portion of the employee
8 handbook, right?

9 A. Correct.

10 Q. And I want to direct you to the middle
11 of the first page here. There's an e-mail from
12 Walt Rodgers to yourself and David Luke copied on
13 it. Do you see that?

14 A. Yes.

15 Q. And is this the e-mail that you've been
16 referring to?

17 A. Yes.

18 Q. So you know, at least at this point,
19 the decision in your mind was final?

20 A. Yes.

21 Q. And then if, you don't know if maybe
22 the decision had been made and finalized prior to
23 this; is that accurate?

24 A. That is accurate.

25 Q. And it says, termination strategy. Do

1 you see that?

2 A. Yes.

3 Q. Did you talk termination strategy with
4 Mr. Rodgers?

5 A. I do not recall a termination strategy,
6 no.

7 Q. Do you recall any further participation
8 on your end regarding the misappropriation issue
9 from the time you got this e-mail on February 6th
10 until the time you met with Mr. Lankford?

11 A. Do I recall any further discussions on
12 the investigation or termination?

13 Q. Investigation.

14 A. No.

15 Q. And so, this is on February 6th. You
16 forwarded on February 7th, Dan Oehler confirms
17 later that day. Do you see that?

18 A. Yes.

19 Q. And then from that point until the time
20 you met, physically met with Mr. Lankford, there
21 was no other involvement on your end?

22 A. No.

23 Q. All right. Tell me what you did to
24 prepare for the termination meeting? Did you do
25 anything, review anything at that point?

1 A. I do not recall what I reviewed. David
2 Luke and myself met in the conference room before
3 Paul got there. We had all the paperwork
4 necessary, and I don't remember if I read through
5 the investigation again, but it was not much
6 preparation. It's not like we sat down and had a
7 strategy.

8 MR. MANSELL: Can we go off the
9 record real quick?

10 (WHEREUPON, discussion off the
11 record was had.)

12 BY MR. MANSELL:

13 Q. You said that you and Mr. Luke met and
14 prepared and you had all the appropriate paperwork?

15 A. Yes, there was really no strategy. It
16 was black and white. He stole from the company.
17 It was pretty easy.

18 Q. And did you fill out the exit interview
19 paperwork?

20 A. Yes.

21 Q. And did you do that before the meeting,
22 during the meeting, after the meeting?

23 A. I'm not sure what parts were filled out
24 when. I do not recall.

25 Q. How long did the meeting last for?

1 A. To the best of my knowledge, 45
2 minutes.

3 Q. Who did most of the talking? Was it
4 you or Mr. Luke or a combination?

5 A. Mr. Luke did most of the talking.

6 Q. Anything related to the investigation,
7 would you be getting that information from Mr. Luke
8 anyway?

9 A. Yes. He went through the investigation
10 with Mr. Lankford.

11 Q. Are you aware of any other sales reps
12 that have either worked for you or you have
13 knowledge of with RelaDyne that have been
14 terminated for using samples for personal use or
15 something similar to what Mr. Lankford did in this
16 situation?

17 A. Since I've been with RelaDyne, no.
18 Prior to that, I don't have any idea.

19 Q. And when you started with RelaDyne was
20 when?

21 A. Around February, it's been over two
22 years. It'll be three years February 1st, I
23 believe, of 2016.

24 Q. The e-mail on Exhibit 13 where Dan
25 Oehler is confirming to move forward with the

1 termination, is that something that Dan Oehler
2 would have to authorize in the situation? What did
3 you understand him saying, confirmed, to mean?

4 A. Confirmed as far as Walt's response.

5 Q. He's agreeing?

6 A. Right. Correct. Is my interpretation.
7 You would have to ask Dan.

8 Q. Did anyone ever call you after Mr.
9 Lankford left RelaDyne for any reference, job
10 reference about Mr. Lankford?

11 A. No job references.

12 Q. All right. Are there any conversations
13 or meetings that you had related to Mr. Lankford's
14 rehab or leave of absence, medical leave of absence
15 that we haven't discussed here today?

16 A. To the best of my knowledge, no.

17 Q. Okay. Is there any conversations or
18 meetings that you had with anybody from RelaDyne
19 about Mr. Lankford's termination on
20 misappropriation of product that we haven't
21 discussed here today?

22 A. To the best of my knowledge, no.

23 (WHEREUPON, Plaintiff's Exhibit 14
24 was marked for identification.)

25 BY MR. MANSELL:

1 Q. I'm going to hand you what's been
2 marked as Plaintiff's Exhibit 14. Let me know when
3 you've had a chance to look over this e-mail.

4 A. (Witness reviews document.) I have.

5 Q. And I want to direct you to the middle
6 of the page. Ann Boeckermann asks you on February
7 17th, how did it go? Do you see that?

8 A. Yes.

9 Q. I'm assuming she's referring to the
10 termination meeting?

11 A. I would assume, but I do not know.

12 Q. Is that what you assumed when you
13 responded above?

14 A. Yes.

15 Q. And you say, not bad. Poor thing
16 looked like he was high on something. Feel sorry
17 for him. Do you see that?

18 A. Yes.

19 Q. Why do you think Mr. Lankford looked
20 high? What was your perception?

21 A. I mean, his eyes did not look right,
22 his actions. I was very scared for him. I noted
23 that on his exit interview, and I was, almost
24 wanted to call the cops. I was very worried as far
25 as liability of him leaving and maybe getting into

1 an accident. It was, I was scared for him.

2 Q. What do you mean by high?

3 A. Like, we did not, I did not smell
4 alcohol, but he looked like he was high. I mean,
5 he was fidgety, just like that's, high on
6 something, on a pill. I don't know. It could have
7 been, I don't think it was alcohol, but it was,
8 something was, in my opinion, he did not seem 100
9 percent there.

10 Q. And is that the first time you ever saw
11 Mr. Lankford like that?

12 A. Yes.

13 Q. And you were aware that Mr. Lankford
14 had a drinking problem prior to him going to
15 Florida; is that right?

16 A. I had heard, yes, some. Tim had told
17 me, when I had told Tim that he was in rehab that,
18 because Tim was the GM before me, that he had gone
19 in before.

20 Q. While he was an employee of Oil
21 Distributing or sometime before you got there?

22 A. Correct.

23 Q. And Tim had knowledge of that and told
24 you?

25 A. Correct.

1 Q. All right. Any other conversations
2 about Mr. Lankford's rehab either the time in 2014
3 or his previous time?

4 A. No.

5 Q. Did you have any issue or concern that
6 Mr. Lankford did not finish his rehab program?

7 A. Did I have any concerns? To me, that
8 didn't even enter my mind because once the
9 investigation was done, it really did not matter.

10 Q. And you weren't his treating physician
11 to know whether or not he was able to return to
12 work or what his condition was, right?

13 A. I saw no paperwork.

14 MR. MANSELL: All right. I don't
15 have anything further.

16 MR. WINTERS: I have nothing. We
17 will have signature if it's ordered.

18 (WHEREUPON, the deposition
19 concluded at 12:59 p.m.)

20

21 * * * * *

22

23

24

CHARLES ANTHONY DOWNS

25

C E R T I F I C A T E

STATE OF OHIO

SS.

COUNTY OF MONTGOMERY

I, Lainey Fergusson, the undersigned, a Certified Shorthand Reporter, and Notary Public within and for the State of Ohio, do hereby certify that before the giving of aforesaid deposition said CHARLES ANTHONY DOWNS, was by me first duly sworn to state the truth, the whole truth, and nothing but the truth; that the foregoing is the deposition given at said time and place by said CHARLES ANTHONY DOWNS; that said deposition was taken in stenotypy by the court reporter and transcribed into typewriting under her supervision; that said transcribed deposition was submitted to the witness for his examination; the court reporter was neither a relative of nor attorney for any of the parties to this case nor relative of nor employee for any of the counsel; neither the court reporter nor the affiliated court reporting firm has a financial interest under a contract as defined in Civil Rule 28(D).

IN WITNESS WHEREOF, I hereunto set my hand and official seal of office this 31st day of August, 2015.

LAINEY FERGUSON, CSR
Notary Public, State of Ohio
My Commission Expires 12-24-18

1 PLEASE USE THIS ERRATA SHEET TO MAKE ANY
2 AND ALL CORRECTIONS, BY LISTING THE PAGE NUMBER,
3 LINE NUMBER AND THEN A BRIEF DESCRIPTION OF THE
4 ERROR. PLEASE DO NOT MAKE ANY MARKS OR CORRECTIONS
5 ON THE TRANSCRIPT. IF NEEDED USE THE BACK OF THIS
6 SHEET. UPON COMPLETION PLEASE SIGN AND DATE THIS
7 SHEET AT THE BOTTOM. THANK YOU.

8 _____
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23 _____

24 SIGNATURE: _____ DATE: _____
25

1 A. I have no idea what he thought. That has
2 nothing to do with the termination and that's the only
3 thing I was concerned about.

4 Q. Sure. But this is the e-mail that you received
5 giving you directive to terminate Mr. Lankford, correct?

6 A. Yeah, at the very top it states that.

7 Q. This e-mail chain?

8 A. The e-mail chain, yes.

9 Q. Okay.

10 MR. FRIEDMANN: Okay. I have no further
11 questions.

12 MR. BERNAT: We'll take signature. If he
13 orders, e-mail it to me and I'll get him to sign.

14 (Deposition concluded at 12:01 p.m.)

15

16

17

- - -
 8/28/15
CHARLES ANTHONY DOWNS

18

19 (LJ)

20

21

22

23

24

25

Gregory Mansell

From: Tony Downs
Sent: Monday, February 03, 2014 8:25 AM
To: Bob Johnson; Dan Oehler
Subject: RE: Paul Lankford / TireMan

He has told some he is out on medical leave – Thanks - TD

From: Bob Johnson
Sent: Monday, February 03, 2014 8:13 AM
To: Dan Oehler; Tony Downs
Subject: Paul Lankford / TireMan

Guys:

With Paul being out, I am happy to coordinate with Brian @ UCI for Friday's meeting. Wondering what I should communicate as to why Paul is out?

Bob Johnson
Automotive Channel Manager
317-696-3009



Connect with RelaDyne:



Gregory Mansell

From: Tony Downs
Sent: Tuesday, February 04, 2014 8:57 AM
To: Dan Oehler; Douglas Oehler
Subject: FW: Paul Lankford / Tire Man

FYI – Paul L checked himself into rehab last Thursday in Florida for 35 days due to drinking – He told me he had notified the “Oehler’s” so I take it he had talked to you two – He claims he told some of his customers he would be on medical leave and gave them contact names and numbers - - Donna is calling from the inside and I have Phil Marino handling his larger volume accounts – I did talk to Bob Kemper from Grismer Tire and he has been very unhappy with Paul for not calling on his Manager’s at the stores (Phil to visit all stores) and wants Paul off his account – We will let him cool down and I will visit with Bob and get his account settled – Let me know if you have any other suggestions – Walt R has been notified as well - Thanks - TD

From: Bob Johnson
Sent: Monday, February 03, 2014 8:13 AM
To: Dan Oehler; Tony Downs
Subject: Paul Lankford / TireMan

Guys:

With Paul being out, I am happy to coordinate with Brian @ UCI for Friday’s meeting. Wondering what I should communicate as to why Paul is out?

Bob Johnson
Automotive Channel Manager
317-696-3009



Connect with RelaDyne:



Gregory Mansell

From: Dan Oehler
Sent: Tuesday, February 04, 2014 9:02 AM
To: Tony Downs; Douglas Oehler
Cc: Walt Rodgers
Subject: RE: Paul Lankford / Tire Man

Tony—He did NOT tell me. I found out yesterday from Bob Johnson. I'm in Houston and we will need to discuss this. We have too many signs to ignore and not proactively address.

Dan Oehler
VP of Sales and Marketing
RelaDyne, LLC
www.RelaDyne.com

9395 Kenwood Rd. Ste #104
Blue Ash, OH 45242

(o) 513.247.1443
(m) 513.476.4957

From: Tony Downs
Sent: Tuesday, February 04, 2014 8:57 AM
To: Dan Oehler; Douglas Oehler
Subject: FW: Paul Lankford / Tire Man

FYI – Paul L checked himself into rehab last Thursday in Florida for 35 days due to drinking – He told me he had notified the “Oehler’s” so I take it he had talked to you two – He claims he told some of his customers he would be on medical leave and gave them contact names and numbers - - Donna is calling from the inside and I have Phil Marino handling his larger volume accounts – I did talk to Bob Kemper from Grismer Tire and he has been very unhappy with Paul for not calling on his Manager’s at the stores (Phil to visit all stores) and wants Paul off his account – We will let him cool down and I will visit with Bob and get his account settled – Let me know if you have any other suggestions – Walt R has been notified as well - Thanks - TD

From: Bob Johnson
Sent: Monday, February 03, 2014 8:13 AM
To: Dan Oehler; Tony Downs
Subject: Paul Lankford / TireMan

Guys:

With Paul being out, I am happy to coordinate with Brian @ UCI for Friday’s meeting. Wondering what I should communicate as to why Paul is out?

Bob Johnson
Automotive Channel Manager
317-696-3009



Gregory Mansell

From: Tony Downs
Sent: Tuesday, February 04, 2014 10:23 AM
To: Ann Boeckermann
Subject: FW: Investigation into misappropriation of product
Attachments: Investigation into misappropriation of product.docx

Tony Downs
General Manager

RelaDyne – Reliability in Motion
5228 River Road – Cincinnati, OH. 45233-1643
513-467-3148 Direct | 513-467-3100 Main
859-948-4992 Mobile | 513-467-3486 Fax
tony.downs@reladyne.com
www.reladyne.com



From: David Luke
Sent: Monday, January 27, 2014 3:16 PM
To: Tim Mastropaolo; Tony Downs
Subject: Investigation into misappropriation of product

Here is a written report on the allegation(s) against Paul Lankford.-Dave



Investigation into misappropriation of product

There has been an allegation against Paul Langford regarding misappropriation of product with the intent to defraud a customer.

According to the complainant lodged by the Manager (Dan) of Covington Auto Body located at 2111 Mote Dr. Covington, Ohio 45318, Paul Lankford approached him regarding a charitable event involving a local Charity. The arrangement was to be, Oil Distributing would donate oil and filters for six (6) oil changes, which were to be raffled off through this charity. Covington Auto body was to use the donated oil and filter and perform the oil changes in hopes of attracting new customers.

The first person to have their oil changed was Paul's mother, who stated to Dan the manager that Paul gave her the oil changes for Christmas as a gift.

The second customer who came into the shop for an oil change was Paul's sister-in-law.

Being suspicious of what might be going on, Dan contacted the charity and talked to someone he knew and asked if Paul Lankford, Oil Distributing Company or Reladyne was involved in type of donations? After checking the records, no evidence could be found relating to any donations made by Paul, ODC, or Reladyne.

Upon making his delivery of several cases of oil and one case of filters to Covington Auto Body our driver Bruce Gee asked the Manager Dan, how does he rate getting products for free? Dan started to explain how the deal was supposed to work. Dan stated Paul told him if Covington Auto body would do the changes as part of their donation and it would generate new business for him. Dan feels like he is losing money in labor and in topping off all the fluids during an oil change and he was duped into doing these oil changes

Upon hearing this allegation Bruce contacted his supervisor Mark Mielnicki who notified Tim Mastropaolo the Director of Operations. Once Tim had this information he contacted me to look into this matter on January 14, 2014.

Bruce Gee contacted me to inform me that the third oil change had occurred at Covington Auto Body, the customer stated he was a buddy of Paul's and Paul gave to him as a Christmas gift.

The plan is to interview Dan of Covington Auto Body and to obtain the name of the charity and the contact person to review and obtain documentation on the charity.

Gregory Mansell

From: Douglas Oehler
Sent: Wednesday, February 05, 2014 11:27 AM
To: Tony Downs; Dan Oehler
Subject: RE: Paul Lankford report

This is separate issue and warrants loss of job, in my mind we keep it to just this topic if we choose to replace

From: Tony Downs
Sent: Wednesday, February 05, 2014 11:26 AM
To: Douglas Oehler; Dan Oehler
Subject: RE: Paul Lankford report

I agree – We need to be careful how we handle due to his Rehab and lawsuits but I think we have enough to dismiss –
Thanks - TD

From: Douglas Oehler
Sent: Wednesday, February 05, 2014 11:22 AM
To: Tony Downs; Dan Oehler
Subject: RE: Paul Lankford report

The last two reports from Paul are terrible and really questions many things going on. I would plan to make a change in this territory. Reps need to be reliable and trusted , he has proven different in many cases.

From: Tony Downs
Sent: Wednesday, February 05, 2014 11:17 AM
To: Dan Oehler
Cc: Douglas Oehler
Subject: FW: Paul Lankford report

FYI – Dave Luke to send more information – Thanks - TD

From: David Luke
Sent: Wednesday, February 05, 2014 11:11 AM
To: Tim Mastropaolo; Tony Downs
Subject: Paul Lankford report

Here is the report on Paul I combined both reports page 1 and page 2, I will scan all documents I have so we can send it to Dan and Walt-Dave



Gregory Mansell

From: David Luke
Sent: Thursday, February 06, 2014 11:08 AM
To: Walt Rodgers; Dan Oehler; Douglas Oehler
Subject: Paul Lankford
Attachments: Paul Lankford report.docx; Paul Lankford.pdf

Here is the supporting documents along with the report you already should have.

Thank you

David Luke

Director of Loss Prevention
Safety and Compliance
Reladyne LLC
(O): 513-467-3115
(C): 513-378-9715
david.luke@reladyne.com

“Safety is non – negotiable it is a condition of employment”



1 free duramax full svc.
oil change. Compliments
of Express tire and auto
centers and Reladyne
R Paul Laykford

1 free duramax full svc.
oil change. ~~1~~
Complimentary of express
tire and auto center and
R Paul Laykford Reladyne

These are the cards that were used to
redeem oil changes issued by Paul
Laykford. placed on the back of business
cards.

This is the card that are issued for any type
of charitable event/donation for free oil changes.

This card is not redeemable for cash, and lost or stolen
cards will not be replaced except as required by law. At
merchants option, card expires 12 months after date of
purchase, except where prohibited.
May be used at any Express Tire & Auto Centers locations

4263

25th
cc



TROY EXPRESS TIRE & AUTO CENTER

Page 1 of 1

846 W. MAIN ST.

TROY, OH 45373

Phone: (937) 440-6449

Fax: (937) 440-8112

Email:

Web Address: WWW.ETAC1.NET

Invoice

67825

Estimate Ref #: 6,711

Date Printed: 02/04/2014

Printed Time: 10:51 am

Hat/Ref #

" IMPECCABLE SERVICE, DRIVEN BY INTEGRITY "

Time Promised:

Lankford, Tish

109 REGENCY CT.

COVINGTON, OH 45318

Home: (937) 335-9993

Cell:

Email:

2004 FORD FOCUS LX L4 2.0L 1989CC 122CID FI GAS N P

VIN: 1FADP33P64W156097

License: FMQ6646

Unit #:

Mileage In: 85,685

Mileage Out: 85,685

DOM:

Date Written: 01/03/2014

Written By: DONN GOFF

Save Old Parts: No

Job Name	Description	Technician	Qty	List	Extended
F/S DURAMAX LOF	FULL SERVICE DURAMAX LUBE OIL AND FILTER	MICHAEL EPLEY			
Labor	TEC				\$10.99
Work Requested - F/S DURAMAX LUBE OIL AND FILTER					
Work Performed - FULL SERVICE LUBE OIL AND FILTER					
Part	5W30 DURAMAX	DURAMAX SYNTHETIC BLEND OIL GF-5	5.00	\$3.00	\$15.00
Part	M185 / VO23	OIL FILTER	1.00	\$4.00	\$4.00
				Discount:	\$29.99

Payment Date	Type	Method	Amount
Payment Totals:			

Parts: \$19.00
Labor: \$10.99
Sublet: \$0.00
Misc: \$0.00
Discount: \$29.99
Hazmat: * \$0.00
Supplies: * \$0.00

Tax Total: \$0.00
Invoice Total: **\$0.00**
Less Paid: \$0.00
Balance Due: \$0.00

THANK YOU FOR CHOOSING TROY EXPRESS

I hereby authorize the above repair work to be done along with the necessary material and hereby grant you and/or your employees permission to operate the car or truck herein described on streets, highways or elsewhere for the purpose of testing and/or inspection. An express mechanic's lien is hereby acknowledged on above car or truck to secure the amount of repairs thereto.

Authorized By _____

Date _____

Time _____

Gregory Mansell

From: Dan Oehler
Sent: Friday, February 07, 2014 12:25 PM
To: Tony Downs; Douglas Oehler
Subject: RE: Paul Lankford report

Confirmed.

Dan Oehler
VP of Sales and Marketing
RelaDyne, LLC
www.RelaDyne.com

9395 Kenwood Rd. Ste #104
Blue Ash, OH 45242

(o) 513.247.1443
(m) 513.476.4957

From: Tony Downs
Sent: Friday, February 07, 2014 8:22 AM
To: Dan Oehler; Douglas Oehler
Subject: FW: Paul Lankford report

FYI

From: Walt Rodgers
Sent: Thursday, February 06, 2014 8:50 AM
To: Tony Downs
Cc: David Luke
Subject: RE: Paul Lankford report

Tony – We need to talk termination strategy. Per our Disciplinary Action Policy on page 50 of the Associate Handbook, we are in the clear to move on him.

513-247-1440

Thanks!

Walt

Ps Dave Luke – very nice work here. Thank you!

From: Dan Oehler
Sent: Wednesday, February 05, 2014 10:57 PM
To: Walt Rodgers
Cc: Tony Downs; Douglas Oehler
Subject: FW: Paul Lankford report



Walt: Tony may have sent this to you also, but I want to make sure that you have as well. I discussed with Tony today my thoughts, but we need to consult with you regarding his rehab condition. I'm happy to interject my opinions when desired. I have great loyalty of course to my past team, and I believe in Paul's capabilities. However, his lapses and ethics have both passed that loyalty.

Dan Oehler
VP of Sales and Marketing
RelaDyne, LLC
www.RelaDyne.com

9395 Kenwood Rd. Ste #104
Blue Ash, OH 45242

(o) 513.247.1443
(m) 513.476.4957

From: Tony Downs
Sent: Wednesday, February 05, 2014 11:17 AM
To: Dan Oehler
Cc: Douglas Oehler
Subject: FW: Paul Lankford report

FYI – Dave Luke to send more information – Thanks - TD

From: David Luke
Sent: Wednesday, February 05, 2014 11:11 AM
To: Tim Mastropaolo; Tony Downs
Subject: Paul Lankford report

Here is the report on Paul I combined both reports page 1 and page 2, I will scan all documents I have so we can send it to Dan and Walt-Dave

Gregory Mansell

From: Tony Downs
Sent: Monday, February 17, 2014 12:00 PM
To: Ann Boeckermann
Subject: RE: Paul Lankford

Not bad – Poor thing looked like he was “high” on something – Feel sorry for him!!!!

Tony Downs
General Manager

RelaDyne – Reliability in Motion

5228 River Road – Cincinnati, OH. 45233-1643
513-467-3148 Direct | 513-467-3100 Main
859-948-4992 Mobile | 513-467-3486 Fax
tony.downs@reladyne.com
www.reladyne.com



From: Ann Boeckermann
Sent: Monday, February 17, 2014 11:55 AM
To: Tony Downs
Subject: RE: Paul Lankford

How did it go?

From: Tony Downs
Sent: Monday, February 17, 2014 11:50 AM
To: Chris Chaille; Ann Boeckermann; David Luke
Subject: FW: Paul Lankford

FYI

From: Nick Kessinger
Sent: Monday, February 17, 2014 11:44 AM
To: Tony Downs
Subject: RE: Paul Lankford

Let me dig through my records. I know we sent those sales guys some netbooks a while ago, but not everyone got one. Let me check my records and get back to you. I am still working on disabling everything and will let you know when it is completed.

Nick Kessinger
IT Tech Support Rep – RelaDyne
O 513.247.1451
Nick.Kessinger@RelaDyne.com

